



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AB:JRS

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 15, 2020

By ECF and E-Mail

The Honorable James Orenstein  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: In re Search and Seizure Warrant for a Silver Audi Car  
Docket No. 20-MJ-307

Dear Judge Orenstein:

The government respectfully submits this letter to request that the Court:

1. Seal the currently docketed version of the search warrant and its underlying application, because they contain personal identifying information of an individual who is a subject of a federal grand jury investigation;
2. Replace that unredacted version with a redacted version of the warrant and its underlying application, which redacts all personal identifying information, as set forth in Exhibits B and D; and
3. Direct that personal identifying information — specifically, the subject's name and license plate number — be redacted from the case name and docket entries on ECF.

The justification for these requests is set forth in the enclosed letter from Assistant United States Attorney Michael D. Neff of the United States Attorney's Office for the Southern District of New York.

For the reasons set forth in AUSA Neff's letter, the government further respectfully requests that AUSA Neff's letter and its attachments be filed under seal.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Jonathan Siegel  
Jonathan Siegel  
Assistant U.S. Attorney  
(718) 254-6293

Enclosures

cc: Clerk of Court (by ECF)  
Michael D. Neff, Esq. (by E-Mail)  
Gerald B. Lefcourt, Esq. (by E-Mail)  
Faith A. Friedman, Esq. (by E-Mail)